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September 29, 2022

Request GRANTED.

**By ECF Only**

Honorable Lewis J. Liman, U.S.D.J.  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Courtroom 15C  
New York, New York 10007

SO ORDERED.

A handwritten signature of Lewis J. Liman in black ink.

LEWIS J. LIMAN  
United States District Judge

September 29, 2023

**Re: Graham Chase Robinson v. Canal Productions, Inc. et al.  
Civil Action No. 1:19-cv-9156 (LTS) (KHP) (the "Action")**

Dear Judge Liman:

This firm represents defendant Canal Productions Inc. ("Canal"), along with Traub Lieberman Straus & Shrewsberry LLP serving as co-counsel for Canal and counsel for defendant Mr. Robert De Niro (collectively, the "Defendants") in the Action. We submit this letter on behalf of the Defendants and jointly with counsel for plaintiff, Graham Chase Robinson ("Plaintiff" and together with Defendants, the "Parties").

Counsel for the Parties are diligently working to prepare and file the Joint Pretrial Order, in accordance with the Court's May 26 Order, entered on May 27. The Parties are jointly requesting adjustment of the following dates:

- October 2: (No change) Parties will file the Joint Pretrial Order without lists of exhibits.
- October 5: (Moved from October 2) Parties will file respective exhibit lists, along with the submission of jury instructions, proposed voir dire, and verdict form, in accordance with the Court's Individual Practices in Civil Cases.
- October 9: (Moved from October 2) Parties filing of motions *in limine*.
- October 16: (Moved from October 9) Parties filing responses to the motions *in limine*.

There are no other modifications to any dates set by the Court being sought. It is the Parties' intention to use the additional time to: (i) agree on exhibits without duplication, and to resolve evidentiary objections, and; (ii) to limit the number of motions *in limine*.

There have been no prior requests for adjournments of these deadlines by the Parties.

We thank the Court for its consideration of this joint request.

Respectfully submitted,

**TARTER KRINSKY & DROGIN LLP**

By: /s/ Laurent S. Drogin

cc: All counsel of Record (via ECF)